

memorandum

Idaho Operations Office

Date: April 17, 2009

Subject: Approval to Proceed with Preparation of an Engineering Evaluation/Cost Analysis for the Test Reactor Area-632 Hot Cells (EM-FMDP-09-030)

To: Idaho Cleanup Project
CERCLA Administrative Record

This memorandum documents the Department of Energy, Idaho Operations Office (DOE-ID) decision to prepare an Engineering Evaluation/Cost Analysis (EE/CA) to evaluate decontamination, decommissioning, and dismantlement (DD&D) activities for the Test Reactor Area (TRA)-632 Hot Cells, through the use of Non-Time Critical Removal Action (NTCRA) authority. Performance of the activities described herein will be in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 USC § 9601 et seq.), as amended by the "Superfund Amendments and Reauthorization Act of 1986 (SARA)" (Public Law 99-499), and with the "National Oil and Hazardous Substances Pollution Contingency Plan" (40 CFR Part 300). This action is consistent with the joint U.S. Department of Energy (DOE) and U.S. Environmental Protection Agency (EPA) *Policy on Decommissioning of Department of Energy Facilities Under the Comprehensive Environmental Response, Compensation, and Liability Act* (DOE and EPA 1995), which establishes the CERCLA NTCRA process as an acceptable regulatory approach for DD&D. This memorandum also opens an administrative record for information supporting selection of the decommissioning methodology.

Background:

The scope of this NTCRA is intended to include disposition of the three hot cell structures located within building TRA-632 at the Idaho National Laboratory. Decommissioning preparatory activities, including demolition of the building surrounding the hot cells at TRA-632, are being conducted through a separate non-time critical removal action pursuant to the *Action Memorandum for General Decommissioning Activities under the Idaho Cleanup Project* (DOE/ID-11293). TRA-632 is a slab-on-grade structure, and potential soil contamination and piping beneath the slab is not included within the scope of this EE/CA, and will be addressed through other regulatory programs. The types of wastes expected to be encountered during the general decommissioning of these facilities includes, but is not limited to: solid wastes, low-level wastes from removal of contaminated equipment and structural materials, shielding lead, and wastes associated with the hot cell windows.

Proposed Project:

This NTCRA is expected to comprise removal and disposal of the radiologically contaminated hot cells. Other hazardous substances may be encountered, or generated,

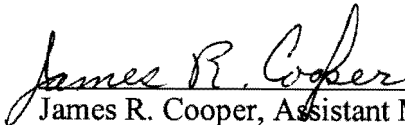
during the general DD&D of the hot cells, which will be dispositioned in accordance with applicable, or relevant and appropriate requirements. Conducting the DD&D activities for the hot cells through the NTCRA approach will allow management of wastes generated as CERCLA wastes, and is intended to allow greater flexibility for waste disposition. In so doing, initiation of the removal of contaminated material would be expedited and the overall protectiveness of human health and the environment will be enhanced through the performance of the removal action.

An EE/CA will be performed to evaluate suitable alternatives and to provide cost estimates for the NTCRA. The selected alternative to perform the decommissioning activities will be described in an Action Memorandum. The EE/CA and Action Memorandum will be subject to the CERCLA Community Relations Plan¹ requirements for stakeholder notifications and involvement. Preparation of the EE/CA and community involvement activities performed in accordance with the NTCRA are also intended to satisfy environmental review requirements of the National Environmental Policy Act .

Approval to Conduct EE/CA:

Approval is hereby given by DOE-ID to conduct an EE/CA for the decommissioning of the TRA-632 Hot Cells. R. Mark Shaw is designated as the spokesperson. The completed EE/CA shall be made available for public review and comment.

Approved:


James R. Cooper, Assistant Manager
Facility and Material Disposition
Idaho Cleanup Project

4/17/2009.
Date